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March 18, 2016

VIA ECF AND HAND-DELIVERY

The Honorable Shelley C. Chapman  
United States Bankruptcy Court for the  
Southern District of New York  
One Bowling Green  
New York, New York 10004

Re: *In re Lehman Brothers Holding Inc.*, Case No. 08-13555 (SCC)  
Recent Developments Concerning Motion of Lehman Brothers Holdings  
Inc. to Enforce the Automatic Stay, the Plan, and the Confirmation Order  
Against iFreedom Direct Corporation and SecurityNational Mortgage Co.

Dear Judge Chapman:

We represent Lehman Brothers Holding Inc. ("LBHI") in the above-referenced action. On February 17, 2016, LBHI filed a motion seeking to enforce the Automatic Stay, Plan of Reorganization and Confirmation Order against iFreedom Direct Corporation (f/k/a New Freedom Mortgage Corporation ("iFreedom")) and SecurityNational Mortgage Company (the "Motion"). In the Motion, LBHI noted that iFreedom had filed five actions against LBHI seeking declaratory judgments in the United States District Court for the District of Utah (the "Utah Actions").

We write to advise the court of recent developments in the Utah Actions. On March 7, 2016, U.S. District Court Judge Tena Campbell issued an order scheduling oral argument for April 6, 2016 on LBHI's pending Motion to Consolidate and Stay Proceedings in the Utah Actions (the "Order"). The Order also provides that Judge Campbell will only discuss the issue of whether to consolidate the cases, and that the court will not entertain discussion of the stay until the consolidation issue is decided. Attached for the Court's convenience is a copy of the Order.

Respectfully submitted,

s/ Adam M. Bialek

Adam M. Bialek

Enclosure

cc: Robert Honeywell (via e-mail only)  
Gifford W. Price (via e-mail only)

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF UTAH  
CENTRAL DIVISION

<p>iFREEDOM DIRECT CORPORATION,</p> <p>Plaintiff,</p> <p>vs.</p> <p>LEHMAN BROTHERS HOLDING INC.,</p> <p>Defendant.</p>	<p>ORDER</p> <p>Case No. 2:15-cv-00868-TC</p>
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Defendant Lehman Brothers Holdings, Inc. has moved the court to consolidate this and four other cases under Rule 42(a) of the Federal Rules of Civil Procedure and local rule DUCivR 42-1. (Mot. Consolidate & Stay Proceedings, ECF No. 9.) The four other cases are numbered: 2:15-cv-00869-DN; 2:15-cv-00872-JNP-DBP; 2:15-cv-00877-JNP-DBP; and 2:15-cv-00878-DB.

The court sets oral argument for April 6, 2016 at 10:00 AM to discuss only the issue of whether to consolidate the cases. Although the Defendant's motion simultaneously asks to stay the cases, the court will not entertain discussion on this topic until the consolidation issue is decided.

DATED this 7th day of March, 2016.

BY THE COURT:



TENA CAMPBELL  
U.S. District Court Judge